

## **HASQARD Focus Group**

### **Meeting Minutes**

**April 17, 2018**

The meeting was called to order by Jonathan Sanwald, HASQARD Focus Group Chair at 2:00 PM on April 17, 2018 in Conference Room 223 at 2430 Stevens Center Place.

Those attending were: Jonathan Sanwald, HASQARD Focus Group Chair (Mission Support Alliance (MSA)), Cliff Watkins - Focus Group Secretary (Corporate Allocation Services, DOE-RL Support Contractor), Marcus Aranda (Wastren Advantage Inc. Wastren Hanford Laboratory (WHL)), Glen Clark (Washington River Protection Solutions (WRPS)), Jim Douglas (CH2M HILL Plateau Remediation Company (CHPRC)), Fred Dunhour (DOE - Office of River Protection (DOE-ORP)), Scot Fitzgerald (CHPRC), Markus McGrath (WRPS), Heather Medley (CHPRC), Anthony Nagel (CHPRC), Karl Pool (Battelle – Pacific Northwest National Laboratory (PNNL)), Geoff Schramm (WRPS), Paula Sellers (Waste Treatment Completion Contractor (WTCC)), Noe'l Smith-Jackson (Washington State Department of Ecology), Chris Sutton (CHPRC).

- I. The Chair requested review and approval of the meeting minutes from the HASQARD Focus Group held on March 20, 2018. The draft minutes from the meeting were distributed and time was allowed for one final review. Hearing no additional comments on the draft meeting minutes, the minutes from the March 20, 2018 meeting were approved.
- II. The Focus Group Chair recognized that this would be the last HASQARD Focus Group meeting that Chris Sutton will attend. The Chair expressed gratitude for all of the contributions Chris has made to the HASQARD efforts throughout the years. Chris thanked the Chair for the recognition and introduced Heather Medley to the Focus Group. Heather will assume the role of Manager of the CHPRC Analytical Support Group and in that role will be the Buyer's Technical Representative for all subcontracted analytical laboratories used by CHPRC for analyses relevant to HASQARD.

Noe'l Smith-Jackson also expressed her appreciation for the positive working relationship, responsiveness to questions and technical contributions provided by Chris Sutton to the Washington State Department of Ecology during his tenure at Hanford.

- III. At the February meeting of the Focus Group, a representative of WRPS management, Joel Hebdon, attended the meeting to discuss his view that the HASQARD Focus Group and HASQARD document should be considered on the same level as the site-wide committees that develop and maintain the Hanford Site safety manuals (e.g., the Hoisting and Rigging, Fall Protection Program and Confined Space Program manuals). Joel expressed the view that

if HASQARD was at the same level as these safety manuals it would have Senior Management Team (SMT) buy-in and visibility. This level of representation and oversight would ensure greater knowledge of, and compliance with, HASQARD across the site.

At the February meeting, the Focus Group Secretary took the action to contact the coordinator of the SMT committees to discuss the possibility of HASQARD becoming another document under the purview of the SMT. The Secretary reported that the coordinator was contacted and to address his concern that his DOE customer approved of the increased work scope that would result from SMT involvement with HASQARD, a meeting was scheduled. The Secretary reported that on April 11 a meeting was held with the SMT coordinator (Darrell Riffe of MSA), the DOE-RL Deputy Assistant Manager for Safety and Environment (Brian Stickney), the DOE-RL Acting Director for Environment, Safety and Quality (Paul Pak), the DOE-RL Industrial/Occupational Safety Team Lead and SMT Champion (Stan Branch) and the HASQARD Focus Group Secretary. The Secretary summarized the meeting held on April 11.

At the April 11 meeting, Darrell Riffe stated that he had talked to Joel Hebdon about his concerns and how the SMT may be able to help. Darrell said he was familiar with the HASQARD Focus Group, had read the Focus Group Charter and perused a few sets of the minutes produced after Focus Group meetings. Darrell stated his belief that the Focus Group is functioning effectively and properly with open, available and transparent communication to the applicable community. Darrell stated that in the J3 table in the MSA contract there is a clear mandate for the SMT oversight and coordination role. That table refers to Site-Wide Safety Standards. For his work scope to include HASQARD would require DOE-RL approval in some formal manner. Darrell said there has been some precedent for inclusion of a non-safety related document or program to fall under SMT oversight. Darrell cited the site-wide Employee Concerns Program being in the purview of the SMTs as an example of this. Darrell's understanding of Joel's issue was to simply give HASQARD more visibility amongst senior management within the companies. Darrell believes that senior management has sufficient awareness of HASQARD and its role in the environmental cleanup activities at Hanford. The issue raised by Joel seems to be isolated to WRPS. Those in attendance at the meeting agreed and also discussed some of the issues associated with including HASQARD in the SMTs (e.g., unnecessary involvement of the Bargaining Unit Presidents). Darrell stated that aside from the SMTs, the Contractor Interface Board may be another avenue for getting more visibility for HASQARD if that is determined to be a genuine issue. The personnel in attendance at the meeting agreed that no action would be taken at this time and that this topic could be revisited if additional requests for SMT involvement with HASQARD are raised.

The Secretary closed the discussion asking if there were any questions and/or whether this initiative (i.e., inclusion of HASQARD as a SMT area of focus) needs to continue. Chris Sutton stated that he believes maintaining that status quo would be fine and Geoff Schramm agreed. The Chair concurred and stated that without any stated opposition, no additional actions are needed on this initiative at this time.

- IV. The HASQARD Focus Group has initiated a standing agenda item to discuss the status of activities associated with the DOE Consolidated Audit Program – Accreditation Program (DOECAP-AP) at all HASQARD Focus Group meetings. This month, the following updates were discussed:

Jonathan Sanwald stated that he has seen some email traffic regarding accessing information updates on the DOECAP SharePoint site. The SharePoint site contains information on schedules, contacts and an individual folder for each laboratory that will be accredited. Access to areas on the SharePoint site are set up relative to a user's "need to know." A note must be sent to Steve Clark with justification to change an individual's accessibility. For example, the laboratories have access to the site but only to the folder associated with their laboratory. DOECAP auditors have a much greater level of access.

Jonathan asked if a copy of the third party checklist would be available for review on the SharePoint site. Jim Douglas stated that he did not believe that it would be.

Jonathan asked if anyone has been scheduled as an observer on one of the DOECAP-AP Accrediting Body (AB) audits yet. Scot Fitzgerald stated that he has been asked to observe or be a radiochemistry auditor (the specifics of the request were not clear) at the audit being scheduled at Test America Richland (TARL). Scot said that the request he received asked him to serve as a "technical advisor to the audit" and what he read and what he was asked to read, it appears that he will be an observer. The contact requesting him to do this was received about three weeks prior to the Focus Group meeting. Karl Pool asked if Scot will audit radiochemistry since the ABs don't have experience doing that. Scot stated that while it is still a bit unclear, he believed this would be his role. That is, he will serve as an auditor or training an AB radiochemistry auditor. Jonathan asked that Scot let the rest of the Focus Group know the date the TARL audit is scheduled. Scot said he would do that as soon as the dates are known.

Heather Medley stated that she was recently in contact with personnel from the General Engineering Laboratories (GEL) facility in Charleston, SC and they have not been given a date to expect the DOECAP-AP audit.

Glen Clark stated that he has been in contact with personnel at the ALS

laboratory in Ft. Collins, CO and they do not know when their DOECAP-AP audit will occur. Glen said he would put in a call to Steve Clark to try to determine what is going on with the DOECAP-AP audit scheduling.

Heather Medley state that the Test America laboratory in St. Louis will also need to audited for radiochemistry and added that this will mean Scot should go on that audit as well. Scot Fitzgerald agreed.

Glen Clark stated that with so many audits coming due you would think that the DOECAP-AP would be letting the DOECAP auditors know of the need to provide observers for the DOECAP-AP audits so travel plans can be approved and made. Glen recalled Steve Clark stating that they would give the observers six weeks' notice prior to each DOECAP-AP audit.

Jonathan thanked the membership for the update and requested that they keep him informed in case one of the Hanford Contractors' subcontracted laboratories is about to fall off of the Acquisition Verification Services (AVS) Evaluated Suppliers List (ESL) and a separate audit needs to be scheduled.

Glen Clark stated that this could occur in the case of Columbia Basin Analytical Laboratories (CBAL) but the latest he has heard is that they will be getting audited by a DECAP-AP AB.

- V. The Focus Group began discussing the status of efforts to produce Revision 5 of HASQARD.

The task of producing Revision 5 of HASQARD has been assigned to three subcommittees focused on revising a specific Volume or in the case of Volumes 3 & 4, two Volumes. The Chair for each subcommittee began updating the status of the work conducted by their subcommittee since the last Focus Group meeting.

Volume 1 Subcommittee (Chair: Paula Sellers):

The subcommittee assigned revision of specific sections to different individuals. They have completed revision of Sections 1-7. They have engaged a technical editor who has made comments that may need to be addressed by the Focus Group in final editing. One discussion they have had is in regards to the glossary found in Volume 1 (Appendix A). The concern is that if a definition is revised by the Volume 1 subcommittee, would it impact the work of the other subcommittees. This is something the Focus Group will remain conscious of but, because only Volume 1 contains a glossary, any revised definitions proposed by the subcommittee can be reviewed when the revision goes out for Focus Group review and comment.

The Volume 1 subcommittee has been meeting weekly and believes they will

have a revision ready for Focus Group review by mid-June.

Paula Sellers noted that Chris Sutton had raised a concern that the software QA section (Section 7) may contain more requirements than are necessary for laboratory software QA. Paula stated that there is no software QA expert on the subcommittee so they could use some help with this. Chris Sutton stated that the requirements in Section 7 are stated as they are because when HASQARD Revision 4 was being drafted, an individual familiar with software QA was requested to write that section. Jonathan Sanwald stated he has some experience with software QA and could lend a hand. The Focus Group discussed where the requirements for software QA come from. The HASQARD has never been developed to comply with NQA-1, therefore the only other driver is DOE Order 414.1D. The language in that Order is applicable only to safety software. Therefore, laboratory software would be excluded. The Focus Group agreed that software QA needs to be addressed and a desire to determine if EPA has any minimum requirement specifications for laboratory software QA. Glen Clark asked if any of the contractors were still only required to use DOE Order 414.1C in their contract. Paula Sellers stated that the WTP contract references 414.1C and has not been updated but will be upon commissioning of the low activity waste facility. Chris Sutton stated that Volume 1, Section 7 was derived mostly from NQA-1, the Quality System for Analytical Services (QSAS) document (the document that was the source of DOECAP requirements at the time) and the CHPRC internal software management plan. The original intent was to write the section with more requirements than seemed necessary and the Focus Group comments would vet the document to what is required. This did not happen very well due to the expertise of the reviewers. Therefore, people more versed in software QA should get involved with this. While many of the requirements in the current revision of Volume 1, Section 7 may not be necessary, Chris stated that software security is a concern in the laboratories and that section should be retained and perhaps enhanced. Glen Clark agreed to share this section with Bob Kerns, a software QA subject matter expert (SME) at WRPS. Jonathan Sanwald suggested that Denise Fast would be another good resource for helping to determine the appropriate software QA requirements for HASQARD. Geoff Schramm added that Denise and Brad Schafer (another good resource) work in his group, so Geoff will share review of the software QA section with them. Paula asked Jonathan if he had the action to follow-up with the individuals he mentioned and Jonathan said he would. Jonathan stated that most of the personnel at MSDA that were experienced in software QA have retired. He has heard that in the Engineering group at MSA there are new software QA SMEs and he will look into this also.

Volume 2 Subcommittee (Chair: Geoff Schramm):

Geoff Schramm reported that he feels fortunate for the group that has volunteered to revise Volume 2 and thanked Glen Clark for his contribution to

two subcommittees and the time commitment that involves.

The subcommittee has met one time. They have established a SharePoint site where all members can access and edit and/or make comments in the document. They also have a message board on the SharePoint site where subcommittee members can discuss ideas.

Geoff stated that as some of the content of Volume 1 is revised, it will have impacts in Volume 2. The subcommittee is maintaining awareness of this. Chris Sutton and Geoff Schramm have discussed the process that was used in development of Revision 4 of Volume 2.

Glen Clark asked if Chris Sutton was the primary author for Revision 4 of Volume 2. Chris stated that he was with significant input from Washington Closure Hanford personnel. Chris stated that Revision 4 of Volume 2 was developed by reorganizing the contents of Revision 3 rather than a completely rewriting it. The reorganization was done to make the document flow more like the EPA Contract laboratory Program (CLP) Sampler's Guide which is a commonly used reference for sampling instructions. However, Revision 4 retained most of the text from Revision 3. Glen Clark asked if the CLP Sampler's Guide is viewed as a requirements document by EPA. Chris stated that it is not, but it contains good information used for planning to conduct field sampling. Glen stated that SW-846 Chapter 9 contains requirements for sampling but it was written in 1986, is hard to read and may be where the requirements found in HASQARD Volume 2 originated. Chris pointed out that SW-846 was developed by the EPA Office of Solid Waste and is therefore focused on meeting EPA's Resource Conservation and Recovery Act (RCRA) program requirements. Much of the sampling at Hanford is to meet Comprehensive Environmental Response Compensation and Liability Act (CERCLA) applications. The CLP program was developed to meet CERCLA needs of EPA. Both the CLP Sampler's Guide and SW-846 Chapter 9 will contain good material for Hanford to adopt in HASQARD Volume 2 because samples are collected to meet both programs' needs at different times. Chris said that HASQARD Volume 2 should provide enough material to allow sampling teams to use good professional judgment in determining the requirements that apply to their sampling (e.g., which EPA regulatory program the sampling is supporting).

Glen Clark asked if there are any known differences between requirements for sampling for RCRA programmatic needs versus CERCLA. Chris Sutton stated that in the CLP, there are a lot of references to electronic data submittal to EPA. However, those processes are not applicable to the Hanford Contractors. Chris stated his opinion that some of the best sampling guides he has ever read were developed by the Department of Defense (DOD). For example, sampling guides developed for the Air Force Center for Environmental Excellence (AFCEE) are very good.

Glen Clark said that the CLP Sampler's Guide was written in 2014 (perhaps more recently) and SW-846 Chapter 9 was written in 1986. He then asked if samples from Hanford Contractors are going to laboratories to meet CERCLAS or RCRA needs. Chris Sutton stated that most laboratories analyze samples using SW-846 methods regardless of the program for which the samples are collected. This is because the CLP methods require conformance to the CLP statement of work for QC requirements, corrective actions if QC fails, etc. The SW-846 methods allow the chemists to use more professional judgment in providing the best results. Chris said that the two thirds of the samples collected by CHPRC support CERCLA decisions and one third support RCRA. Following this discussion, Glen stated the conclusion that we need to ensure that HASQARD Volume 2 meet both CERCLA and RCRA requirements for sampling.

Volume 3/4 Subcommittee (Chair: Jim Douglas):

Jim Douglas reported that the subcommittee has met twice since the last Focus Group meeting.

Jim stated he likes the idea of a SharePoint site and will look into setting one up for this subcommittee.

Jim stated that at the first meeting they discussed Volume 3. The subcommittee had been made aware that the Volume 1 subcommittee would be eliminating references to "process chemistry analysis" from HASQARD. If that is the case, Volume 3 will be revised to align with that. Jim said that one of the subcommittee members, Wendy Thompson, had brought up a case where process chemistry should be viewed as applicable to HASQARD QA. Therefore, as this language is resolved, it may take further discussion with the entire Focus Group to ensure consensus can be reached.

The question was posed, "what is the difference between process chemistry and environmental monitoring?" Chris Sutton stated that perhaps the term process chemistry should be revised to say process monitoring. Chris pointed out the conduct of operations culture within which we work covers much of the what HASQARD does for us in the environmental analysis field.

Anthony Nagel asked whether analyzing potable water using a Hach colorimetric indicator test kit was process chemistry or environmental monitoring. After discussion, Glen Clark concluded that perhaps potable water analyses were not applicable to HASQARD. Paul Seller added that any analyses required by permit, which could include drinking water, are applicable to HASQARD. One Focus Group member added that currently analyses of drinking water for determination of compliance with the Safe Drinking Water Act are applicable to the scope of HASQARD.

Jim Douglas added that two members of his subcommittee, Robert Elkins and Judy McCluskey are working on implementing the suggestion to remove any sentences that use the word “should” from paragraphs that also contain requirements. These “should statements” will be added as “Notes.”

Jim Douglas stated that the subcommittee will be “on hold” with regard to how to address the process chemistry questions for Volume 3 until the semantics can be agreed upon.

Glen Clark mentioned that the QSM uses the calculations found in the Multi-Agency Radiation Laboratory Analytical Protocols Manual (MARLAP) but HASQARD uses the N42 Standard versions of the same calculations. Glen asked if consistency between HASQARD and the QSM in regards to the calculations used could be improved. The Focus Group discussed this and realized that the DOECAP-AP will audit to the QSM and therefore, no auditors will be checking whether the HASQARD versions of the calculations are being used. Scot Fitzgerald added that the requirements for laboratories to address client-specific requirements found in the QSM would drive the laboratories back to using the HASQARD calculations for Hanford samples, but agreed that aligning the HASQARD calculation with those found in the QSM would help prevent errors at the laboratories. Jim Douglas said that he needs a decision on whether the Focus Group wants the subcommittee to align the calculations with the QSM and MARLAP. Chris Sutton suggested that the subcommittee compare the MARLAP calculations with the HASQARD calculations and see how many are different and how different they are. A discussion ensued on whether MARLAP is more current than the calculations found in HASQARD or not. Jim Douglas said he would discuss this matter with Rich Weiss also to gain greater insight. Noe’l Smith-Jackson and Karl Pool both recalled a cross-walk between HASQARD and MARLAP being produced by someone sometime about 2010.

Chris Sutton mentioned that EPA has eliminated the prescriptive methods for determining method detection limits (MDL) from the most recent revision of SW-846. Glen Clark stated that when Revision 4 of HASQARD was produced, it also tried to be less prescriptive about how MDLs are to be determined. Scot Fitzgerald concurred saying that HASQARD was revised so it would not tie a laboratory to a specific method.

Glen Clark mentioned that another issue with HASQARD Volume 4 is that there are a number of tables expressing QC acceptance limits that were originally in agreement with those found in the SW-846 methods. The fact that EPA continually revises the SW-846 methods results in HASQARD ultimately being out of sync with the methods it is attempting to align with. Jim Douglas stated that the tables will be eliminated from Revision 5 of HASQARD in favor of references to the latest revision of SW-846.



Glen Clark asked if the subcommittee was thinking about combining Volumes 3 and 4. Jim stated that as of this meeting, the subcommittee was not in favor of combining the two Volumes. This is to ensure each volume could stand alone and be used independently of the other. However, attempts will be made to reduce duplicative language.

Anthony Nagle asked if making the material unique to Volume 3 into an appendix to Volume 4 would work. Jim Douglas committed to revisit these questions with the subcommittee.

VI. The Chair asked if there was any new business to discuss.

The Chair asked the Secretary to add a discussion on process chemistry to the next Focus Group meeting agenda.

Hearing no additional new business, the Chair adjourned the meeting at 3:18 PM.

The next meeting of the HASQARD Focus Group will be at 2:00 PM on May 15, 2018 in Conference Room 223 at 2430 Stevens Center Place.